

MCIA

1 Rye Hill Office Park
Coventry
CV5 9AB
Tel: 02476 408000
Email: j.luckman@mcia.co.uk



Consultation on the Introduction of Green Number Plates for Ultra-Low Emission Vehicles

Who are MCIA?

The MCIA is the Trade Association representing the Powered Light Vehicle (PLV) Industry, which includes all segments that are covered within the EU L-Category regulations.

The MCIA has been established for over 100 years and during this time, vehicles in this sector have evolved from pioneers of the internal combustion engine, to providing clean and efficient personal and family transport that underpins an industry that is now worth in excess of £7 billion.

Today, PLVs are more relevant than ever, as their efficiency and size provide an obvious solution to the Government's 'Grand Challenges' regarding transport and the future of mobility. Products are increasingly zero emission.

Overall position

MCIA is very supportive of the initiative to give low emission vehicles a distinctive new number plate that will distinguish them against higher CO2 vehicles. However, we are concerned that in the consultation it is suggested that this may translate into benefits such as access to bus lanes or parking facilities. Whilst we recognise that these decisions are ultimately up to local authorities, we would recommend that other factors, particularly use of road space, are more relevant for these kinds of incentives than CO2 emissions.

MCIA would welcome any opportunity to discuss this further.

Jenny Luckman

Transport Policy & Road Safety Manager

Tel: 02476 408032

Response to individual questions

Q1a: Do you agree with our proposal that only zero emission vehicles would be eligible for green number plates?

No.

Q1b: If you disagree, explain why, including what requirement you think would be suitable?

The MCIA supports the alternative option (2b) of using the ULEV definition set by government of 50g/km of CO2. Although there are very few vehicles which meet this definition in other vehicle categories, in L-category we have a large number of small vehicles which could potentially meet this definition that will provide a real alternative for individuals and businesses

making a choice between differing vehicle options. A green number plate would make the distinction clear.

Q2a: Do you agree with our proposal that the green number plate design should be restricted to the left-hand side of the number plate?

No.

Q2b: If you disagree, explain why, including what you think would be more suitable?

MCIA supports Option 1. Number plates can be quite small from a distance and this would be the clearest way of indicating a differing status. Many other markets have different coloured number plates for public service vehicles or taxis, and these are routinely different colours for the whole number plate and not just a part. With current ANPR enforcement relying on the retroreflective properties of British number plates, the actual colour of the retroreflective part shouldn't make a difference to the ability of modern ANPR software to distinguish between backing and lettering.

Adding a mark or flash would look cluttered and make it harder to read with the naked eye, particularly as modern number plates often already have a blue flash or national symbol.

Q6a: Do you agree with our proposal that the green number plates should not be mandatory?

No.

Q6b: Do you agree with our proposal that the green number plates should be opt-out?

No.

Q6c: If you disagree, explain why, including what you think would be more suitable?

Green number plates should be mandatory for new registrations with an option to allow older vehicles to use them. If the plates remain optional for all vehicles, the current supply chain would not be incentivised to provide materials for green plates making their fitment more expensive than current plate designs.

Q7a: Do you agree that after the introduction of the plates both new and existing qualifying vehicles will be able to access them?

Yes.

Q8a: Do you agree that green number plates should be open to qualifying cars, vans, taxis and motorbikes, but that buses, coaches and HGVs are out of scope?

No.

Q8b: If you disagree, explain why, including what you think would be more suitable?

The scheme should be mandatory for all new vehicle registrations regardless of the vehicle. With technology catching up rapidly, excluding categories would create hostages to fortune for later incentives.